

EXHIBIT B

Subject: FW: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

From: Martorana, Keith R. [<mailto:KMartorana@gibsondunn.com>]
Sent: Monday, August 14, 2017 7:30 PM
To: Steel, Howard S.
Subject: Re: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

External E-mail. Use caution accessing links or attachments.

You can send now. Nothing to add in the note

On Aug 14, 2017, at 7:27 PM, Steel, Howard S. <HSteel@brownrudnick.com> wrote:

Thanks, want me to send now or wait?

Want any language added to the note to Arthur?

From: Martorana, Keith R. [<mailto:KMartorana@gibsondunn.com>]
Sent: Monday, August 14, 2017 7:26 PM
To: Steel, Howard S.
Subject: Re: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

External E-mail. Use caution accessing links or attachments.

We are waiting for final approval from client, but unlikely to come tonight. You are, however, authorized to send current versions to New GM this evening

On Aug 14, 2017, at 6:44 PM, Steel, Howard S. <HSteel@brownrudnick.com> wrote:

How's the trust looking on sign off?

From: Golden, Daniel [<mailto:dgolden@AkinGump.com>]
Sent: Monday, August 14, 2017 4:10 PM
To: Steel, Howard S.; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; Lnorman@andrewsmyers.com; kelly@hmglawfirm.com
Cc: Weisfelner, Edward S.; Steve@hbssl.com; ChrisO@hbssl.com; ecabraser@lchb.com; Geman, Rachel (External); esserman@sbep-law.com; Forster, Jill L.
Subject: RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

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I think that is right; participating holders are signed off subject to guc trust being signed off

Daniel H. Golden

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From: Steel, Howard S. [<mailto:HSteel@brownrudnick.com>]

Sent: Monday, August 14, 2017 4:06 PM

To: Golden, Daniel; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; lnorman@andrewsmyers.com; kelly@hmglawfirm.com

Cc: Weisfelner, Ed (External); Steve@hbsslaw.com; ChrisO@hbsslaw.com; ecabraser@lchb.com; Geman, Rachel (External); esserman@sbep-law.com; Forster, Jill L.

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We can send to him when everyone signed off - please advise if you have not already

To confirm will send to him: all of docs circulated to this group this morning. will not be sending him proffered evidence and expert reports

From: Golden, Daniel [<mailto:dgolden@AkinGump.com>]

Sent: Monday, August 14, 2017 3:48 PM

To: Martorana, Keith R.; Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; lnorman@andrewsmyers.com; kelly@hmglawfirm.com

Cc: Weisfelner, Edward S.; Steve@hbsslaw.com; ChrisO@hbsslaw.com; ecabraser@lchb.com; Geman, Rachel (External); esserman@sbep-law.com; Forster, Jill L.

Subject: RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

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Can someone please advise me who will be in a position to send the final documentation to Arthur by cob today. We need to do this so he doesn't use this as an excuse at the Thursday chambers conference.

Daniel H. Golden

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From: Martorana, Keith R. [<mailto:KMartorana@gibsondunn.com>]
Sent: Monday, August 14, 2017 3:46 PM
To: Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Golden, Daniel; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; bobh@hmgllawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; Lnorman@andrewsmyers.com; kelly@hmgllawfirm.com
Cc: Weisfelner, Ed (External); Steve@hbsslaw.com; ChrisO@hbsslaw.com; ecabraser@lchb.com; Geman, Rachel (External); esserman@sbep-law.com; Forster, Jill L.
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On the DTC Notice, the percentage of Unitholders represented by Akin should be 65%. If you are controlling the final versions of the documents, can you please make that change?

At this point we do not have any further comments, but are obtaining final sign-off from our client.

Keith Martorana
Of Counsel

GIBSON DUNN

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From: Steel, Howard S. [<mailto:HSteel@brownrudnick.com>]
Sent: Monday, August 14, 2017 1:32 PM
To: Weintraub, William P <WWeintraub@goodwinlaw.com>; Fox, Gregory W. <GFox@goodwinlaw.com>; dgolden@akingump.com; dnewman@akingump.com; nmoss@akingump.com; Williams, Matt J. <MJWilliams@gibsondunn.com>; Gillett, Gabriel K. <GGillett@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; bobh@hmgllawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; Lnorman@andrewsmyers.com; kelly@hmgllawfirm.com; Martorana, Keith R. <KMartorana@gibsondunn.com>
Cc: Weisfelner, Edward S. <EWeisfelner@brownrudnick.com>; Steve@hbsslaw.com; ChrisO@hbsslaw.com; ecabraser@lchb.com; rgeman@lchb.com; esserman@sbep-law.com; Forster, Jill L. <JForster@brownrudnick.com>
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Please see attached proposed final execution versions of all of the documents. Redlines are to versions circulated Friday.

Please let us know any comments or questions and confirm when you are signed off. Thanks.

Howard S. Steel
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